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February 7, 2001

**BY HAND DELIVERY**

Jeff S. Jordan, Esquire  
Supervisory Attorney  
Central Enforcement Docket  
Federal Election Commission  
999 E Street, N.W.  
Washington, DC 20463

Re: MUR 5164

Dear Mr. Jordan:

We represent the Reform Party of the United States and its Chairman, Gerald Moan. We also represent Mr. Moan in his capacity as the Treasurer of the Reform Party 2000 Convention Committee (hereinafter "the Committee"). In that regard, we have been furnished with your letter of January 12, 2001 and with copies of four Letters of Complaint filed with the Federal Election Commission by Donna Donovan.

In her first letter, Ms. Donovan questions the legitimacy of the Committee's convention expenditures because she contends that the Reform Party Convention held in Long Beach, California was illegal. Ms. Donovan asserts that legitimate delegates were denied participation in the Convention and illegitimate delegates were seated. As you may know, Ms. Donovan was part of a rump group which held a counter convention across the street from the location which had been rented by the Reform Party and its National Nominating Convention. Ms. Donovan's contentions that legitimate delegates were denied participation in the Convention is untrue. Any legitimate delegate who wished to attend the Convention was free to pick up a delegate badge and attend. Without knowing who specifically is alleged to have been denied a seat in the Convention Hall, it is difficult to respond with any more precision. I was present at the Convention as counsel to the Party. In fact what happened is that some members of the

RECEIVED  
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COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
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rump group failed to pick up their badges, preferring to attend the counter-convention. I also can advise with certainty that the credentials of disputed delegates were determined by a credentials committee for the Party and ultimately the Convention itself. It is denied that delegates were seated improperly.

Moreover, the "legality" of the Convention has been the subject of litigation in the Superior Court for Los Angeles, County, California. The Superior Court action was brought by the Reform Party against various members who, like Ms. Donovan and in association with her, participated in the rump convention and purported to nominate John Hagelin as the party's presidential nominee, and then place him on various states' ballots. The defendants in that case raised the same argument raised by Ms. Donovan, *i.e.*, that the Long Beach Convention was "illegal." Los Angeles Superior Court Judge James L. Wright rejected those arguments, and issued a preliminary and then permanent injunction affirming the legitimacy of the Long Beach Convention as chaired by Mr. Moan. A copy of both of those Orders is enclosed.

The next three Complaints by Ms. Donovan can be lumped together as complaints about certain discrete expenditures made by the Committee. The first challenged expense is for \$692,296.00 paid to Perelman Pioneer for stage design and production. Perelman Pioneer was one of several bidders that competed for the stage design and production work necessary for the Long Beach Convention. Perelman Pioneer's work resulted in a professional convention witnessed by the FEC Chairman and one other Commissioner, who were present at the Convention for at least one day. In any event, those disbursements are the subject of a pending FEC audit and have been documented by the Committee, and explained to Mr. Richard Halter, who performed the audit on behalf of the FEC. If the General Counsel's Office has any additional questions about these expenditures after reviewing the audit, we would be pleased to give you any further information that may be required.

Ms. Donovan further complains about the expenditure of \$50,000 for a "performance bond" filed in the case before Judge Wright. Actually, the \$50,000 was spent for an injunction bond pursuant to Judge Wright's grant of a preliminary injunction. As set forth above, members of the rump convention, including Ms. Donovan, attempted to place John Hagelin, rather than Pat

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Buchanan, on state ballots around the country as the presidential candidate of the Reform Party. Obviously, the whole purpose of the Committee and the grant of federal funds to run the Convention was to assure that the Party could nominate a presidential candidate to complete in the 2000 election. When Ms. Donovan and others associated with her attempted to place John Hagelin on the state ballots, it became necessary to validate the Convention and its presidential nominee, Pat Buchanan. As such, the action in Long Beach Superior Court was directly related to the Convention. In effect, the entirety of the approximately \$2 million which was spent on the Long Beach Convention would have been wasted without this validation of the Buchanan candidacy. In conjunction with the audit, the Committee provided Mr. Halter with full documentation and explanation of this \$50,000 expenditure.

Ms. Donovan next complains about a \$300,000 disbursement to the Performance Group for stage design and public relations. By way of preface, this expenditure was made by Mr. Moan's predecessor as Treasurer of the Convention Committee, Ronn Young. It is the Party's position that the \$300,000 payment was an improper disbursement by Mr. Young. Accordingly, we are pursuing an action against Mr. Young, the Performance Group, and its individual members in the Circuit Court for Fairfax County, Virginia. A copy of that Complaint is enclosed. As with the other expenditures, the documentation of the \$300,000 expense has been provided to Mr. Halter and the Party's views on that expense have also been provided.

In that the field work for the audit has been essentially completed, we would be happy to respond to any questions remaining after the audit has been finalized.

I hope this is sufficient for respond to the issues raised by Ms. Donovan. If it is not, please contact me directly.

Sincerely,

  
Dale A. Cooter

DAC:kcs  
Enclosure

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 7 Suite 900  
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 8 Telephone number (310) 557-1902  
 Facsimile number (310) 286-2351

9 Attorneys for Plaintiff Reform Party of the United States of  
 10 America and Cross-Defendants Gerald M. Moan, Tom McLaughlin, Phil  
 Alexander, and Frank Reed

11  
 12 **SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**  
**SOUTH DISTRICT**

13 REFORM PARTY OF THE UNITED )  
 14 STATES OF AMERICA, an )  
 Unincorporated Association )

15 Plaintiff, )

16 vs. )

17 JOHN HAGELIN, et al., )

18 Defendants. )

**CASE NO. NC 028469**

**[Assigned to Judge James L. Wright]**

19 REFORM PARTY OF THE UNITED )  
 20 STATES OF AMERICA, JAMES )  
 MANGIA, SUE HARRIS DEBAUCHE, )  
 21 DROR BAR-SADEH, HARRY KRESKY, )  
 JOHN S. HAGELIN, and NAT )  
 22 GOLDHABER, )

**PERMANENT INJUNCTION AND  
 DISMISSAL WITH PREJUDICE**

*AND ORDER THEREON*

23 Cross-Complainants )

24 vs. )

25 GERALD M. MOAN, FRANK REED, )  
 PHIL ALEXANDER, TOM )  
 26 MCLAUGHLIN, PATRICK J. )  
 BUCHANAN, AND EZOLA FOSTER, )

27 Cross-Defendants. )  
 28

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 JAN 20 2000  
 SUPERIOR COURT

1       Upon consideration of the Stipulation of the parties, and good  
2 cause appearing therefor, it is:

3       1. IT IS SO ORDERED that Defendants John Hagelin, James  
4 Mangia, Dror Bar-Sadeh, and Harry Kresky, together with their  
5 representatives, agents, servants, employees and attorneys  
6 (collectively "Defendants"), are hereby enjoined from acting as  
7 officers, authorized representatives, or candidates of the Reform  
8 Party of the United States of America and shall hereby immediately  
9 cease and desist from any and all activities in such representative  
10 capacity, including, but not limited to: (1) solicitation and/or  
11 collection of donations on behalf of the Reform Party of the United  
12 States of America; (2) distribution of Press Releases on behalf of  
13 the Reform Party of the United States of America; (3) operation of  
14 an web-site on behalf of the Reform Party of the United States of  
15 America; (4) expenditure of funds on behalf of the Reform Party of  
16 the United States of America; (5) solicitation of party members on  
17 behalf of the Reform Party of the United States America; (6)  
18 efforts to have John Hagelin listed on state ballots as the  
19 official candidate of the Reform Party of the United States of  
20 America; (7) making any use of the name of the Reform Party of the  
21 United States of America or any substantially similar variant or  
22 derivation thereof; (8) making use of any logos, non-textual  
23 trademarks or service marks belonging to the Reform Party of the  
24 United States of America, and (9) making any other oral, written or  
25 electronic communication in a representative capacity on behalf of  
26 the Reform Party of the United States of America;

27 //

28 //

1        2. ORDERED that nothing herein shall enjoin the Defendants  
2 from their Constitutionally protected rights of free speech and  
3 freedom of assembly;

4        3. ORDERED that nothing herein shall enjoin the Defendants  
5 from seeking membership, office, endorsement, nomination, or  
6 candidacy from the Reform Party of the United States of America, as  
7 provided under the Constitution of the Reform Party of the United  
8 States of America;

9        4. ORDERED that, in the event any of the Defendants attain  
10 membership, office, endorsement, nomination, or candidacy from the  
11 Reform Party of the United States of America, as provided under the  
12 Constitution of the Reform Party of the United States of America,  
13 he is not enjoined from holding himself out or otherwise  
14 identifying himself as a member, officer, nominee, or candidate of  
15 the Reform Party of the United States of America;

16        5. ORDERED that this Order shall be filed forthwith in the  
17 Clerk's Office and entered of record and that the \$50,000.00 cash  
18 deposit in lieu of bond of the Reform Party of the United States of  
19 America required pursuant to this Court's Preliminary Injunction  
20 shall be released forthwith and the funds returned to the Reform  
21 Party of the United States of America, payable to the client escrow  
22 account of Cooter, Mangold, Tompert & Wayson, PLLC;

23        6. ORDERED that Defendant Dror Bar-Sadeh shall relinquish all  
24 right, title, and claim to the domain name [www.reformparty.org](http://www.reformparty.org),  
25 web-site, web page, URL, links between the national and state level  
26 Reform Party of the United States of America web-sites and shall  
27 take all actions necessary to transfer to the Reform Party of the  
28 United States of America effective control of the domain name

1 www.reformparty.org, web-site, web page, URL and links between the  
2 national and state level Reform Party of the United States of  
3 America web-sites;

4 7. ORDERED that Defendant James Mangia shall transfer to the  
5 Reform Party of the United States of America all records and assets  
6 of the Reform Party of the United States of America which are in  
7 his possession, custody or control;

8 8. ORDERED that Defendant Harry Kresky shall transfer to the  
9 Reform Party of the United States of America all records and funds  
10 of the Reform Party of the United States of America which are in  
11 his possession, custody or control;

12 9. ORDERED that the Preliminary Injunction issued by this  
13 Court in the above-captioned matter is vacated as to Sue Harris  
14 DeBauche;

15 10. ORDERED that all claims in this matter brought by the  
16 Reform Party of the United State of America against James Mangia,  
17 John Hagelin, Harry Kresky and Dror Bar-Sadeh, not granted herein,  
18 be and hereby are dismissed with prejudice; and

19 11. ORDERED that all the claims in this matter brought by  
20 James Mangia, John Hagelin, Harry Kresky, Dror Bar-Sadeh and Nat  
21 Goldharber against the Reform Party of the United States, Gerald M.  
22 Moan, Frank Reed, Phil Alexander, Tom McLaughlin, Patrick J.  
23 Buchanan and Ezola Foster be and hereby are dismissed with  
24 prejudice.

25 12. ORDERED that each party shall bear its own costs and  
26 attorneys fees.

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Dated: \_\_\_\_\_

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JAN 01 2000 JUDGE WRIGHT

James L. Wright  
Judge of the Superior Court of  
the County Of Los Angeles

26044141586



1 PROOF OF SERVICE

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

3 I am employed in the aforesaid County, State of California;  
4 I am over the age of 18 and not a party to the within action; my  
5 business address is 2029 Century Park East, Suite 900, Los  
6 Angeles, California 90067-2910.

7 On January 4, 2001, I served the foregoing **PERMANENT**  
8 **INJUNCTION AND DISMISSAL WITH PREJUDICE AND ORDER THEREON** on  
9 interested parties in this action by placing a true copy thereof  
10 which were enclosed in a sealed envelope addressed as follows:

11 **SEE ATTACHED SERVICE LIST**

12 XX BY MAIL

13 XX As follows: I am "readily familiar" with the firm's  
14 practice of collection and processing correspondence for mailing.  
15 Under that practice it would be deposited with the U.S. Postal  
16 Service on that same day with postage thereon fully prepaid at  
17 Los Angeles, California, in the ordinary course of business. I  
18 am aware that on motion of the party served, service is presumed  
19 invalid if postal cancellation date or postage meter date is more  
20 than one day after date of deposit for mailing in affidavit.

21 (BY PERSONAL SERVICE) I caused each such envelope to be  
22 delivered by hand to the offices of the addressee.

23 (BY FAX) I caused a true and correct copy of said document  
24 to be transmitted via electronic facsimile machine and then  
25 placed for deposit in the U. S. Mail with postage thereon fully  
26 prepaid.

27 (State) I declare under penalty of perjury under the laws  
28 of the State of California that the above is true and correct.

Executed this 4th day of January, 2001, at Los Angeles,  
California.

23 FREDDI RAMSEY

Freddie Ramsey

26044141587

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SEP 15 2000

SUPERIOR COURT

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Facsimile number (310) 286-2351

9 Attorneys for Plaintiff Reform Party of the United States  
10 and Cross-Defendants Gerald M. Moan, Tom McLaughlin, Phil  
Alexander, and Frank Reed

11  
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 FOR THE COUNTY OF LOS ANGELES, SOUTH DISTRICT

14 REFORM PARTY OF THE UNITED ) Case No. NC 028469  
15 STATES OF AMERICA, )  
16 Plaintiff, ) [Hon. James L. Wright]  
17 vs. ) PRELIMINARY INJUNCTION  
18 JOHN HAGELIN, et al., )  
Defendants. ) DATE: SEPTEMBER 13, 2000  
TIME: 8:30 a.m.  
DEPT: "S"

19 REFORM PARTY OF THE UNITED )  
20 STATES OF AMERICA, et al., )  
21 Cross-Complainants )  
22 vs. )  
23 GERALD M. MOAN, et al., )  
24 Cross-Defendants. )

1       The Court having considered Plaintiff's Motion for  
2 Preliminary Injunction, Defendants' Opposition thereto, and the  
3 argument of counsel, and good cause appearing therefor:

4       The Court states:

5       When James Mangia left the National Committee Meeting  
6 ("Meeting") of the Reform Party of the United States ("Reform  
7 Party"), he failed to give notice to the remaining unchallenged  
8 delegates of his intent to convene an alternate Meeting. Mangia  
9 also failed to give notice to any of the remaining, unchallenged  
10 delegates, including Gerald Moan, that a vote would be taken to  
11 remove Gerald Moan as Chair of the Reform Party. This lack of  
12 notice violated the due process requirements of the Reform Party  
13 Constitution. Consequently, James Mangia could not be nominated  
14 or elected to hold the position as Chair of the Reform Party and  
15 Gerald Moan remains as Chair.

17       The Meeting and Convention chaired by Gerald Moan were  
18 conducted in conformity with the Reform Party Constitution. The  
19 Meeting and Convention chaired by James Mangia, which resulted in  
20 the John Hagelin nomination, violated the Reform Party  
21 Constitution.

22       Based thereon, the Court makes the following Findings of  
23 Fact:

24                                   FINDINGS OF FACT

- 25
- 26               1. Plaintiff will suffer irreparable injury if the
  - 27               requested injunctive relief is not granted.
  - 28               2. At the Reform Party's National Convention, Patrick

1 J. Buchanan was properly nominated as the party's  
2 candidate for President and Ezola Foster was  
3 nominated as its candidate for Vice President. The  
4 nominations were in conformity with the Reform  
5 Party Constitution.

- 6 3. Defendants are currently holding John Hagelin out  
7 to the public, Reform Party members, State  
8 governments, the Federal Elections Commission and  
9 others as the official Presidential candidate of  
10 the Reform Party. *And NOT Goldhaber as Vice-Presidential*  
11 *Candidate*  
12 4. Defendants are currently stating to the public,  
13 Reform Party members, State governments, the  
14 Federal Elections Commission and others that  
15 Buchanan and Foster are not the legitimate nominees  
16 of the Reform Party.  
17 5. Defendants are currently controlling the Reform  
18 Party's website to the exclusion of the duly  
19 elected officers of the Reform Party.  
20 6. Unless Defendants are enjoined, the Reform Party  
21 will be irreparably harmed by the public confusion  
22 resulting from Defendants' actions.  
23 7. Unless Defendants are enjoined, the public's  
24 confidence in the Reform Party, its management and  
25 its leadership will be diminished, to the  
26 irreparable harm of the Reform Party.  
27 8. Unless Defendants are enjoined, the Reform Party's  
28 ability to communicate with the public will be  
irreparably harmed.

- 1           9. There is a substantial likelihood that Plaintiff  
2 will succeed on the merits of this action because  
3 Defendants have no colorable claim that they are,  
4 or represent, the official Reform Party of the  
5 United States of America or the official candidate  
6 of the Reform Party.
- 7           10. The National Convention of the Reform Party was  
8 ~~chaired by Gerald Moan~~ *conducted* in conformity with the  
9 Reform Party Constitution.
- 10           11. John Hagelin and Nat Goldhaber were not nominated  
11 or selected to serve as candidates of the Reform  
12 Party.
- 13           12. Denial of injunctive relief will cause greater  
14 injury to Plaintiff than the grant of relief will  
15 to Defendants because Defendants have no right to  
16 assert themselves as the representatives or  
17 candidates of the Reform Party.
- 18           13. Issuance of injunctive relief will serve the public  
19 interest by preserving the Reform Party.

20  
21                           PRELIMINARY INJUNCTION

22           IT IS ORDERED that Defendants John Hagelin, James Mangia, Nat  
23 Goldhaber, Sue Harris DeBauche, Dror Bar-Sadeh, Harry Kresky and  
24 their representatives, agents, servants, employees and attorneys,  
25 or anyone acting on their behalf or under their alleged authority,  
26 are hereby enjoined from:

- 27           (1) solicitation and/or collection of donations on behalf  
28 of the Reform Party of the United States;

- 1 (2) distribution of Press Releases on behalf of the Reform  
2 Party of the United States;  
3 (3) operation of an website on behalf of the Reform Party  
4 of the United States;  
5 (4) expenditure of funds on behalf of the Reform Party of  
6 the United States;  
7 (5) solicitation of party members on behalf of the Reform  
8 Party of the United States America;  
9 (6) undertaking any effort or committing ant act to promote  
10 John Hagelin and Nat Goldhaber as the official  
11 candidates of the Reform Party of the United States of  
12 America;  
13 (7) making any use of the name of the Reform Party of the  
14 United States of America or any substantially similar  
15 variant or derivation thereof;  
16 (8) making use of any logos, non-textual trademarks,  
17 service marks, or similar marks belonging to the Reform  
18 Party of the United States of America; and  
19 (9) making any oral, written, electronic or other  
20 communication on behalf of the Reform Party of the  
21 United States of America;

22 IT IS FURTHER ORDERED that Plaintiff shall post a bond of  
23 \$50,000, or deposit that sum with the Court in lieu of a bond,  
24 within twenty-four hours of entry of this Order.

25 SEP 13 2000 JUDGE WRIGHT

26 Dated: September \_\_, 2000

27 Honorable James L. Wright,  
28 Judge of the Superior Court

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the aforesaid County, State of California; I am over the age of 18 years and not a party to the within action; my business address is 2029 Century Park East, Suite 900 Los Angeles, California 90067-2910.

On September 15, 2000, I served the foregoing **PRELIMINARY INJUNCTION** on the interested parties in this action by placing a true copy thereof, enclosed in a sealed envelope, addressed as follows:

Please See Attached Service List

X BY MAIL

X As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

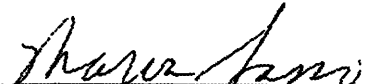
       (BY PERSONAL SERVICE) I caused each such envelope to be delivered by hand to the offices of the addressee.

X (BY FAX) I caused a true and correct copy of said document to be transmitted via electronic facsimile machine and then placed for deposit in the U. S. Mail with postage thereon fully prepaid.

X (State) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

       (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on September 15, 2000, at Los Angeles, California.

  
Marva Sasso



**Reform Party v. Hegelin, et al.**  
**Proof of Service List**

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